Privacy Policy for Broadband Services

Effective Date: November 1, 2015 (Version 1.0)

Your Privacy Rights

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing, and protection of your information.

It applies to the following services (collectively called the "Broadband Services")

- the Virginia Broadband Map Book Portal ("Map Book")
- the Integrated Broadband Planning and Analysis Toolbox ("Integrated Toolbox")
- the Vertical Assets Inventory Tool ("Vertical Assets")
- the Virginia Telecommunications Policy Database ("Policy Database")
- the Survey Cardinal broadband demand survey ("Survey Cardinal")
- the Data Cardinal broadband speed survey ("Data Cardinal")

Consent

You will need to explicitly accept this Privacy Policy at the time you sign up for any of our Broadband Services. Your use of any of the Broadband Services that do not require signup constitutes implicit acceptance of these terms. This Privacy Policy is intended to govern the use of Broadband Services by our users and will be accessible on every page of our services.

Notification of Changes

We may make changes to this Privacy Policy from time to time to reflect changes in the broadband services. We will post any revisions to our website, along with a brief summary of changes and the date the policy became effective. We reserve the right to make these changes without notice. As a courtesy, if you have created an account with us we will attempt to notify you 30 days or more before the changes are put in place.

Types of Information We Collect

We collect the following types of information in order to provide you with the best experience possible.

Anonymous Usage Data

We use **Google Analytics** to collect anonymous usage data of our site and Broadband Services.

What information we collect:

- the time you spent on our site
- the time you spent on each page
- the order in which you visited pages
- the internal links you clicked
- your <u>IP address</u>
- your browser's <u>user agent</u> string
- your geographical location
- the browser you used
- your Operating System
- the screen size of your device
- whether or not you have Java and Flash installed on your device
- the site referring you to our site

To distinguish between page visits by different users, Google Analytics stores a cookie on your computer.

The cookie contains:

- a name identifying the cookie (by default, the name is "_ga")
- the URL of our site (www.cgit.vt.edu)
- the date the cookie expires and is automatically removed (usually two years from your first visit)

Why we collect this information:

We use this information for usage statistics and in order to improve our site and services

Your choice:

You can *opt out* of the collection of usage data through Google Analytics on any website <u>here</u>.

Account Information

Some of our services allow you to create an account to effectively manage the information you contribute, as well as to gain access to information shared by other users.

What information we collect:

- your email address
- your name
- a user name of your choosing
- affiliations with government (as provided by you)
- the data you upload through our website

Why we collect this information:

We use your email address for identification and as a way to contact you, if necessary. Your user name allows other users to share information with you, without revealing your email address.

Your choice:

Creating an account is completely optional. You will also have limited control over choosing who can see your account information. A limited set of staff at CGIT will always be able to access this information for maintenance purposes. An account is required to gain access to certain information shared by other users!

Service Specific Data

The value of our services increases with information contributed by our users. For that reason, we may ask you to contribute information through a web form. The information we collect is different for every Broadband Service.

Map Book

The Map Book service allows you to retrieve information on broadband service coverage in Virginia.

What information we collect:

we are currently not collecting any information

Integrated Toolbox

The Integrated Toolbox service allows you to retrieve information from both the Map Book service and the Policy Database.

What information we collect:

• we are currently not collecting any information

Vertical Assets

The Vertical Assets service allows you to contribute data on vertical assets.

What information we collect:

- the name and type of the asset
- the location of the asset (postal address and GPS coordinates)
- the physical characteristics of the asset (base elevation and height)
- the characteristics of the transmitter
- the owner of the asset (name and contact information)

 the filters you used when downloading a CSV file of assets (currently anonymous)

Why we collect this information:

We collect this information to improve publicly available data, to allow you to manage existing assets, and to plan new assets.

Your choice:

Contributing data to the vertical assets service (which does not include the downloads you make) is completely optional. Should you decide to contribute information, we will give you complete control over choosing the individuals or groups who can view, edit, and administer all or parts of that information.

Policy Database

The Policy Database service allows you to retrieve and obtain reports of policy guidelines and restrictions applicable to a chosen location within Virginia.

What information we collect:

• we are currently not collecting any information

Survey Cardinal and DataCardinal

The Survey Cardinal broadband demand survey and DataCardinal internet speed test collects information for the Commonwealth of Virginia.

What information we collect:

We collect the information that you provide as part of taking a survey. You may choose to quit the survey at any time. Questions that have required answers will be clearly marked.

Why we collect this information:

We collect this information for the Commonwealth of Virginia with the goal to improve planning of broadband Internet access within the state of Virginia. The information contributed gives state officials insights into the services offered and desired, as well as whether or not demand has been met.

Your choice:

Contributing data to the survey is completely optional. Should you decide to contribute information, we will only show the general location of your response in the browser at a scale of 1 inch equals 2 miles (approximately). For analysis and reporting purposes, the maps may be at a larger scale (meaning less generalized).

How You Can Manage Your Information

Should you choose to create an account for our Broadband Services, you will have fine-grained control over who can access the information you contribute through the access control dashboard.

The dashboard allows you to specify your preferences regarding

- What individuals or groups can access your personal information.
- What individuals or groups can access your submitted information (e.g., vertical asset locations and details)
- Whether an individual or group has
 - read-only access
 - o read-write access
 - administrative access (administrative access allows another user to manage the access to your information)

Furthermore, you always have the option of deleting any information you contributed. You can also delete your account at any time. Select CGIT staff will always be able to see any information you provide.

How We Share Information with Third Parties

We will never share your personal or account information (including name, email address, or postal address) with a third party. Co-operating organizations (including, but not limited to the Center for Innovative Technology and the Office of Telework Promotion and Broadband Assistance) are exempt from this. All co-operating organizations will be listed on the page for each Broadband Service. We share this information with these organizations so that they can better direct the development of broadband internet access across the Commonwealth. We will never share any of your service-specific data with third parties without your expressed consent.

How We Use Cookies and Similar Technologies

When you access our website or use Broadband Services, we place two small text files (called "Cookies") on your computer or other device. As mentioned above, we use one of the cookies to collect usage statistics through Google Analytics. We use the second cookie for authentication purposes, should you sign up for an account, and does not contain any personally identifiable information.

You are free to decline our Cookies if your browser or browser add-on permits it. Declining our Cookies **will** interfere with your use of our website and Broadband Services requiring an account by preventing you from being able to log in.

We do not use any other tracking technologies like social media tracking/sharing buttons, flash cookies, pixel tags, or e-tags. However, we do use resources provided by other entities, who may use these technologies.

Do Not Track: Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals.

How We Protect and Store Information

The protection of your privacy is our top priority! We always strive to meet or exceed industry standards in terms of technical, administrative, and physical safeguards to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our servers, and information access authorization controls.

Whenever you interact with our site or the Broadband Services, we will encrypt any information exchanged between you and our servers through HTTPS.

If you create an account, we will encrypt the password you choose. We will not access your information, except in the case of maintenance or the above stated purposes. We do not have access to your password, which is stored in an encrypted format. In the unlikely case of a security breach, we will immediately inform you about the extent of the breach, the information accessed, as well as any measures taken to resolve the situation. Should you notice any suspicious activity on your account, please notify us immediately!

How You Can Contact Us about Privacy Questions

Should you have any questions, concerns, or other feedback you want to share with us concerning this Privacy Policy, you can contact us at cgitsupport@.vt.edu